

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JANE DOE on behalf of herself and her minor child,  
SARAH DOE,

Plaintiff,

-against-

FRANKLIN SQUARE UNION FREE SCHOOL  
DISTRICT, and HOWARD ZUCKER, in his official  
capacity as Commissioner of the New York State  
Department of Health,

Defendants.

**NOTICE OF MOTION**

Docket No. 21-CV-05012  
(FB) (SIL)

**PLEASE TAKE NOTICE**, that upon the Declaration Adam I. Kleinberg with attached exhibits, and the accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss, and upon all prior pleadings and proceedings, defendant FRANKLIN SQUARE UNION FREE SCHOOL DISTRICT, will move this Court before the Honorable Frederic Block, at the United States District Court for the Eastern District of New York, located in Brooklyn, NY, on a date and/or time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b) (6) dismissing this action in its entirety, together with such other and further relief as this Court deems just, equitable, and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Court order, opposition papers are to be filed by January 6, 2022, and reply papers by January 27, 2022.

Dated: Carle Place, New York  
November 16, 2021

**SOKOLOFF STERN LLP**  
*Attorneys for Defendant*  
*Franklin Square*  
*Union Free School District*



By: 

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ADAM I. KLEINBERG  
CHELSEA WEISBORD  
179 Westbury Avenue  
Carle Place, NY 11514  
(516) 334-4500  
File No.: 210142

TO: All counsel of record (via ECF)